



Order Filed on September 21, 2018  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

Bernstein-Burkley, P.C.  
Keri P. Ebeck, Esquire  
Bar No. 262092017  
707 Grant Street, Suite 2200, Gulf Tower  
Pittsburgh, PA 15219  
(412) 456-8112

---

**ATTORNEY FOR CREDITOR: REGIONAL ACCEPTANCE CORPORATION**

---

**IN THE BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY (TRENTON)  
HONORABLE CHRISTINE M. GRAVELLE**

In re: : Case No. 15-18866-CMG  
:   
CONSTANCE W HURTT :   
:   
Debtor, :   
: Chapter 13  
:   
: Hearing Date: August 15<sup>th</sup>, 2018  
:   
\_\_\_\_\_ :

**CONSENT ORDER MODIFYING STAY AS TO MOTOR VEHICLE  
2011 JEEP GRAND CHEROKEE LARADO 4D FILED ON JULY 19<sup>th</sup>, 2018**

The relief set forth on the following pages, number (2) through (3) is hereby  
ORDERED.

**DATED: September 21, 2018**

  
\_\_\_\_\_  
Honorable Christine M. Gravelle  
United States Bankruptcy Judge

Debtors: Constance W. Hurtt  
Case No.: 15-18866-CMG  
Caption of Order: Consent Order Modifying Stay as to Personal Property

---

1. The 11 U.S.C. §362(a) Stay as to Regional Acceptance Corporation, (“Movant”), with respect to the personal property of Debtor described as a 2011 Jeep Grand Cherokee Larado Utility 4D 4WD 3.6L VIN# 1J4RR4GG4BC546755, in accordance with the agreement of the Debtor and Movant is hereby modified and shall remain in effect PROVIDED THAT Debtor comply with the following terms and conditions:

The arrears are \$2,767.00 as of the date of this Consent Order. Debtor shall cure the arrears and fees and costs by making the following payments on the following dates:

September 13, 2018 - \$1,160.17

October 13, 2018 - \$1,160.17

November 13, 2018 - \$1,160.17

December 13, 2018 - \$1,160.17

January 13, 2019 - \$1,160.17

February 13, 2019 - \$1,160.17

Debtor shall then be responsible for timely making all future regular monthly payments to Movant starting with the payment of \$699.00 due on March 13, 2019. Failure to make future monthly payments shall also be cause for default under this Consent Order.

2. The term “payment” as set forth in Paragraph 1, *supra*, does not include a check that is returned due to insufficient funds, account closed or is otherwise not capable of negotiation for any other reason.

3. Debtor will be in default under the Consent Order in the event that Debtor fails to comply with the payment terms and conditions in Paragraph 1, *supra*. If Debtor fails to cure the default within ten (10) days from the date of default, Movant may file a Certification of

Debtors: Constance W. Hurtt  
Case No.: 15-18866-CMG  
Caption of Order: Consent Order Modifying Stay as to Personal Property

---

Default on five (5) days' notice to Debtor's, counsel for Debtors and the Chapter 13 Trustee for an Order lifting the automatic Stay imposed under 11 U.S.C. §362(a) and permitting Movant to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing sale of the motor vehicle without regard to any future conversion of this matter to a different form of bankruptcy.

4. The failure of Movant to file a notice of default will not be construed or act as a waiver of any of the rights of Movant under the Consent Order.

5. In the event Debtor converts to a bankruptcy under any Chapter other than Chapter 13 of the Bankruptcy Code, then the Debtor shall pay all pre-petition arrears and post-petition arrears within fifteen (15) days from the date the case is converted from Chapter 13 to any other Chapter.

Dated: September 13, 2018

**Certificate of Notice Page 4 of 4**  
United States Bankruptcy Court  
District of New Jersey

In re:  
Constance W Hurtt  
Debtor

Case No. 15-18866-CMG  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0312-3

User: admin  
Form ID: pdf903

Page 1 of 1  
Total Noticed: 1

Date Rcvd: Sep 21, 2018

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 23, 2018.

db +Constance W Hurtt, 8 Chambord Court, Trenton, NJ 08619-4701

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Sep 23, 2018

Signature: /s/Joseph Speetjens

---

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 21, 2018 at the address(es) listed below:

Albert Russo docs@russotrustee.com  
Albert Russo on behalf of Trustee Albert Russo docs@russotrustee.com  
Albert Russo (NA) on behalf of Trustee Albert Russo docs@russotrustee.com  
Brian C. Nicholas on behalf of Creditor Deutsche Bank National Trust Company as Trustee for Soundview Home Loan Trust 2005-4, Asset-Backed Certificates, Series 2005-4  
bnicholas@kmlawgroup.com, bkgroup@kmlawgroup.com  
Denise E. Carlon on behalf of Creditor Deutsche Bank National Trust Company as Trustee for Soundview Home Loan Trust 2005-4, Asset-Backed Certificates, Series 2005-4  
dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com  
John Zimnis on behalf of Debtor Constance W Hurtt njbankruptcylaw@aol.com.  
Keri P. Ebeck on behalf of Creditor Regional Acceptance Corporation kebeck@bernsteinlaw.com, jbluemle@bernsteinlaw.com  
Marlena Miller on behalf of Creditor Society Hill at Hamilton II Condominium Association, Inc. collections@theassociationlawyers.com  
Patrick O. Lacsina on behalf of Creditor Select Portfolio Servicing, Inc. , PATRICK.LACSINA@GMAIL.COM  
Rebecca Ann Solarz on behalf of Creditor Deutsche Bank National Trust Company as Trustee for Soundview Home Loan Trust 2005-4, Asset-Backed Certificates, Series 2005-4  
rsolarz@kmlawgroup.com  
Sean M. O'Brien on behalf of Creditor Deutsche Bank National Trust Company as Trustee for Soundview Home Loan Trust 2005-4, Asset-Backed Certificates, Series 2005-4 sobrien@flwlaw.com  
Sean M. O'Brien on behalf of Creditor Deutsche Bank National Trust Company as Trustee for Soundview Home Loan Trust 2005-4, Asset-Backed Certificates, Series 2005-4 sobrien@flwlaw.com  
TOTAL: 12